

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT NEW YORK**

CHARLES ROANE,

Plaintiff,

v.

A&E TELEVISION NETWORKS, LLC,  
SWIRL FILMS, LLC, and JOHN DOES 1-10,

Defendants.

Civil Action No. 1:25-CV-5286

**DECLARATION OF MAURA O'DONOVAN**

I, Maura O'Donovan, declare as follows:

1. I am the Vice President, Media Solutions at AETN. I have personal knowledge of the facts set forth in this declaration, and submit this declaration in support of the Opposition of Defendants A&E Television Networks, LLC ("AETN") and Swirl Films, LLC ("Swirl Films") to Plaintiff Charles Roane's Motion for a Preliminary Injunction.

2. Lifetime, an AETN brand, is a premier entertainment destination for women dedicated to offering the highest quality original programming, spanning scripted series, nonfiction series, and movies.

3. This Saturday, June 28, Lifetime plans to air the feature scripted drama *Pretty Hurts* (the "Film"). The Film follows Julie, played by actress Haylie Duff, as she juggles the demands of her family life and career. Julie's own teenage daughter, Lauren, then enters a beauty pageant that Julie once won, in the hopes of earning college scholarship money. While preparing for the pageant, meningitis suddenly strikes close to home, showcasing the impact of the disease on both their family and an entire community.

4. The Film has been marketed through a carefully designed multiplatform promotional strategy, across digital, social, and linear platforms, which has been carefully planned to drive audience to the June 28 premiere date. This has involved a significant investment of time and effort, exceeding the typical promotional strategy for typical Lifetime programming.

5. A premiere event for the Film was held in May 2025, with national press, influencers, and talent present. Materials for the event emphasized the Film's June 28 premiere date. The cost of this premiere event alone was approximately \$100,000, representing a significant investment into the promotion of the Film.

6. The film has been advertised and marketed through numerous other channels for well over a month. Press releases have been issued promoting the film, all listing the June 28 premiere date. On-air promos citing the June 28 premiere date have been running on the Lifetime and Lifetime Movie Network for weeks, for an estimated 57 million combined household impressions. A billboard advertising the Film and its June 28 premiere date has been up in Times Square since Monday, June 23. The Film is being promoted on the Lifetime website, with links to a landing page advertising the June 28 premiere date. A significant investment has also been made in social media marketing for the Film's premiere, which has also been keyed to the June 28 premiere date.

7. One of the Film's stars, Haylie Duff, was also flown to California this week to sit for press interviews promoting the Film's premiere. Other press interviews are also scheduled for this week, all lined up to "hit"—i.e. create maximum impact—for the June 28 premiere.

8. While I cannot state with accuracy how many people have seen these promotional efforts, the marketing plan for the Film was designed for unusually broad reach. It is my

understanding that the media value of the marketing plan in total amounted to approximately \$1.8 million. I further understand from internal estimations that the promotion strategy to date has resulted in an aggregated reach of approximately 1.2 billion people.

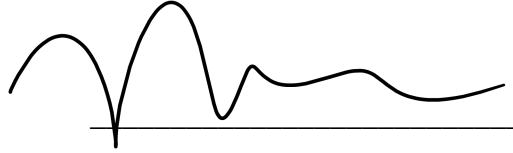
9. The considerable efforts and investment put into promoting the Film would be wasted if the Film were delayed by even a short time. Audiences expecting to tune in on June 28 would not find the Film, and would not know how to find it.

10. Further, advertisements were sold against a premier Film on a timely topic, for which I understand that AETN received significant advertising revenue at rates higher than other replacement content. And any delay to its broadcast would risk violating contractual obligations with our advertising partners, putting substantial revenue at stake.

11. Moreover, if a new premiere date was set, we would have to create and execute a new marketing push around that new premiere date, to ensure we are meeting our responsibilities to audiences and advertisers. Recreating a complex, two-month multilevel promotional campaign on short notice would impose an extraordinary burden of cost and expense upon AETN.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 26th day of June, 2025.

A handwritten signature in black ink, consisting of several loops and a final horizontal stroke, positioned above a solid horizontal line.

Maura O'Donovan